



January 15, 2025

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**Via Electronic Mail (Perez Chambers@paed.uscourts.gov)**

Honorable Mia Roberts Perez, Judge  
601 Market Street  
Philadelphia, PA 19106

**Re: Monge v. Univ. of Pa., et. al., Case No. 2:22-cv-02942 (E.D.  
Pa. 2022); Request for Oral Argument**

Dear Judge Perez:

On November 22, 2024, Plaintiff filed an Omnibus Motion for Reconsideration of the Court's Orders on Defendants' Motions to Dismiss Plaintiff's operative Complaint regarding two distinct issues: (1) whether Defendants' statements could be found to be true despite the fact that there is no evidence of such truth and (2) whether Defendants' efforts to increase the scope of a false narrative against Plaintiff results in the type of assistance creating civil aiding and abetting liability. [Doc. No. 216] The Defendants have since filed Oppositions to Plaintiff's Motion to Reconsideration, and upon review of those Oppositions, it appears oral argument may be useful in clarifying the context surrounding the issues raised and Plaintiff's well-pled factual allegations that apply to each.

Accordingly, Plaintiff respectfully requests that Your Honor schedule oral argument on Plaintiff's Motion docketed at Number 216 at a time convenient for the Court and all parties. In accordance with general practice in the Eastern District of Pennsylvania, my associate, Adam Filbert, Esq., an attorney with three-years' experience, will assist me and participate in the argument.

Respectfully,

**SPECTOR GADON ROSEN VINCI, PC.**

/s/ Alan Epstein

Alan B. Epstein, Esquire

ABE/ddi  
Attachment

Cc: All Counsel of Record

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